

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

**MANUEL JUSINO PALERMO y NAHIR  
GIRON MOREL**

Plaintiffs,

vs.

**DUPONT AGRICULTURAL CARIBE  
INDUSTRIES LIMITED, by itself and  
through its Resident Agent C.T.  
CORPORATION, also known as DUPONT  
CONNECTION and DUPONT  
AGRICHEMICAL; AON HEWITT LLC.;  
TRIPLE S SALUD, INC.; XYZ COMPANY  
and ABS INSURER**

Defendants.

CIVIL NO.: 18-2025 (PAD)

Re: **TORTS, COLLECTION OF MONIES**

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO  
ANSWER THE COMPLAINT OR OTHERWISE PLEAD**

**TO THE HONORABLE COURT:**

COMES NOW codefendants DuPont Agricultural Caribe Industries Limited (now known as “FMC Corporation”) and E. I. du Pont de Nemours and Company (collectively, “DuPont”), through the undersigned attorney and without waiving any defense, respectfully requests that this Honorable Court grant an additional 30-day extension of time, up to and until March 6, 2019, to submit its responsive pleading or otherwise plead based on the following:

1. DuPont’s responsive pleading and/or motion regarding Plaintiffs’ Complaint is due on or before February 4, 2019. (**See Dkt. 13**)
2. DuPont and counsel for Plaintiffs have engaged in discussions and are currently in the process of determining whether this matter can be resolved in an extrajudicial and confidential manner.

3. To that end, DuPont seeks additional time, up to and including March 6, 2019, to respond to the Complaint or otherwise plead.

4. Counsel for Plaintiffs was contacted and consents to the requested extension.

5. This request for extension is made in good faith and not for purposes of delay. The requested extension, moreover, will not prejudice any of the parties and will have no bearing on any deadlines, as no deadlines have been set as of yet.

WHEREFORE, DuPont respectfully requests that this Honorable Court grant an extension of thirty (30) days to answer the Complaint or otherwise plead, up to and including March 6, 2019.

In San Juan, Puerto Rico, this 1<sup>st</sup> day of February, 2019.

Respectfully Submitted.

s/Sara E. Colón-Acevedo

Sara E. Colón-Acevedo

USDC-PR No. 215406

E-mail: sara.colon-acevedo@jacksonlewis.com

s/Tatiana Leal-González

Tatiana Leal-González

USDC-PR No. 301604

E-mail: Tatiana.Leal-Gonzalez@jacksonlewis.com

JACKSON LEWIS LLC

American International Plaza, Suite 404

250 Muñoz Rivera Avenue

San Juan, PR 00918

Telephone: (787) 522-7305

Facsimile: (787) 522-7306

Attorneys for Co-Defendants DuPont Agricultural Caribe  
Industries Limited and E. I. du Pont de Nemours and  
Company

**CERTIFICATE OF SERVICE**

WE HEREBY CERTIFY that on February 1, 2019, we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notice of electronic filing to all counsels of record. Notice of this filing will be sent to Plaintiffs' counsel by email to [lcda.jusinogiron@gmail.com](mailto:lcda.jusinogiron@gmail.com); and by certified mail with return receipt to **AON Hewitt LLC**, Hato Rey Tower, 268 Muñoz Rivera Avenue, San Juan, Puerto Rico, 00918.

In San Juan, Puerto Rico, this 1<sup>st</sup> day of February, 2019.

By: s/ Tatiana Leal-González  
Tatiana Leal-González